Appendix 1:
Public Meeting Summary

Appendix 1 – Part A

PROPOSED ELKO/WELLS RESOURCE MANAGEMENT PLAN
FIRE MANAGEMENT AMENDMENT
PUBLIC MEETING SUMMARY REPORT

Background

In July 2001, the Bureau of Land Management (BLM) initiated work on a Fire Management Amendment to the existing Resource Management Plans (RMPs) for the Elko District. This RMP Amendment is being developed to provide overall direction as well as define operational procedures for fire management activities within the Elko District. Development of the Fire Management RMP Amendment will be guided by the following goals:

- Provide for the protection of life and property.
- Provide for the protection of habitat required by special status species.
- Provide for safe and cost effective resource protection and enhancement.
- Reduce hazardous fuels.

The overall planning process will include an Environmental Assessment (EA), Biological Assessment (BA), and RMP Amendment. These documents will incorporate public and regulatory comments as well as guidance received throughout the public review process.

A number of preliminary issues were identified prior to the public scoping meetings. These issues emerged from a variety of sources including the BLM, other agency staff, phone calls, e-mails and letters from individuals and groups. Preliminary issues were published in the Federal Register under a Notice of Intent and include:

- Need for enhanced guidance for setting suppression strategies
- Use of prescribed fire in high fuel load areas to reduce potential impacts from severe wildfire and to improve habitat
- Protection of sage grouse habitat
- Use of controversial Emergency Stabilization and Rehabilitation (ESR) procedures including fencing and seeding of nonnative plant species
- Managing forest resources to address diverse agency and user concerns
- Management of invasive, nonnative weeds
- Economic effect of fire suppression on local communities
- Communication, training, and cooperation with local communities

To better understand public concerns, public scoping meetings were held September 25, 26, 27 and 28, 2001 in Elko, Eureka, Jackpot and Wells. These meeting led to the identification of additional issues. A second round of public meeting were held May 21, 22, and 24, 2002 in Elko, Eureka, Jackpot and Wells to discuss the proposed action. The District notified the public using 730 newsletters, news releases and radio adds. The following report describes the information obtained at these meetings. Also included in this report is a summary of an interactive issue identification exercise conducted at each meeting.

<u>Public Scoping Meetings – September 25, 26, 27 and 28, 2001</u>

At each scoping meeting, Joe Freeland (Elko District Fire Management Officer) gave a slide presentation that included a description of the Fire Management RMP Amendment process, the

need for the Amendment, the existing fire management areas and the tools available to the District to help manage fire.

Mr. Freeland described how the Fire Management RMP Amendment will provide guidelines for the BLM to modify or reclassify the fire response areas, and will provide guidance for the use of other suppression methods such as mechanical manipulation, prescribed burning and chemical treatments to reduce fuels. Mr. Freeland pointed out that the Amendment would not address large-scale changes or existing polices, but instead would focus on using available tools to help manage fire. Information from the public scoping meetings will be used to develop a draft Fire Management Amendment and Environmental Assessment for public review in the beginning of next year.

Following is a summary of comments made by the public during each public meeting:

<u>September 25, 2001 at Elko, NV</u>
Attendance: 25 members of the public
Note: The Rangeland Resources Commission was present to film this meeting for use in a documentary on the public scoping process.

- The Fire Management RMP Amendment should be integrated with other existing plans (e.g., the sage grouse management plan). This coordination is important since there are other guiding documents currently in place and other planning processes under way in the area.

- The Fire Management RMP Amendment should address the burn periods historically found in the area. Pre-historic burn periods may have varied from 10 to 100 years, depending on the vegetation type and other factors. On average, the burn cycle for our region may be 50 years (average of all vegetation types and conditions). Assuming that the region would benefit from a 50-year average burn cycle, then the BLM would need to burn 600,000 acres/year. The BLM should move toward that goal, which could be determined by evaluating the pre-historic burn period.

- The BLM should utilize local resources more often to help manage fire. Increased use of local resources would reduce costs. The local population has the greatest vested interest in suppressing fires on or near their land/resources.

- The efficiency and success of initial attacks has improved from the "old days." There seems to be a reduced level of politics than from prior times, including quicker response time, streamlined procedures and better coordination with local ranchers.

- Suppression methods are limited whenever cultural resources are present, or suspected of being present. Cultural resources would incur greater damage from very hot fires than from the immediate use of fire suppression actions. Preemptive measures to manage fires, such as fuels reduction in culturally sensitive areas, could be achieved through such measures as the prescribed use of the herbicide, Spike™ (Tebuthiron).

- Grazing could be used as a tool to reduce fuel loads. The concept of managed grazing should be further explored to determine whether there are circumstances under which grazing could be utilized. This could include managed grazing on a burn parcel by the second season if the appropriate conditions are present.

- Grazing management must be coordinated with the needs of wildlife. In general, grazing and other fire management techniques should not compromise the health of wildlife habitat.

- Large fires can be the greatest detriment to wildlife. Ranchers help enhance and manage wildlife habitat, and grazing helps reduce the potential for large fires.

- The management of Wilderness Study Areas (WSA) is impeding fire management activities. A BLM WSA is a roadless area, or island, that has been inventoried and found to possess wilderness characteristics as described in Section 603 of the Federal Land Policy and Management Act and Section 2(c) of the Wilderness Act of 1964. Since this designation is made by federal law, the Fire Management RMP Amendment process cannot modify this designation. In the Amendment, it should be made clear that suppressing fire within a WSA is not precluded, and should otherwise clarify strategies for suppressing and managing fires within WSAs.

- Currently, the BLM recommends a 2-year rest from grazing post-fire. The post-burn grazing of cheatgrass can help feed cattle and improve the establishment of native vegetation if the cattle are removed prior to the emergence of natives.

- Deviations from the recommended 2-year rest should be reevaluated on a case-by-case basis. Under the right conditions, grazing may be able to resume more quickly post-burn. Examples of where a longer rest may be needed could be in select areas that have been ranched too aggressively or if conditions do not favor a quick recovery of native vegetation. Such areas may require a longer rest to recover from the combined effects of fire and aggressive ranching methods.

- It was suggested that the BLM should employ alternative management techniques. The effectiveness of the various techniques could be studied through the establishment and monitoring of test plots. The BLM should be flexible in the methods they pursue. For example, the University of Nevada Cooperative Extension is assessing grazing on test plots that were seeded (seeded plots where grazing was allowed vs. not allowed). The Extension has collected their first season of data and the results of those initial studies will soon be available.

- Some areas are susceptible to repeated burns, such as the I-80 corridor. Furthermore, where there used to be burns that affected 500 to 2,000 acres, we now have 6,000-acre burns in those same general areas. The Fire Management RMP Amendment should address the factors that contribute to such patterns.

<u>September 26, 2001 at Eureka, NV</u>
Attendance: 10 members of the public

- Fire suppression is a leading industry in this region. The lack of grazing in some areas may be the major cause of fire, which therefore supports the fire industry. We should focus on making livestock the leading industry.

- It is more economical to immediately put out small fires than to suppress larger fires.

- It appears that fires of recent years are more of a problem than they used to be. Many factors influence the occurrence of fires and their ultimate size and effect on the landscape (e.g., the weather cycle, the modern emphasis on suppression, and past disturbance at unacceptable levels that resulted in an adverse change in fuels). These factors are

complex. A summary on the interplay of such factors will be included in the Fire Management RMP Amendment.

- Fire suppression can be impeded by the delays in waiting for archaeologists to arrive and check for cultural resources before bulldozer work can begin. Known cultural resource sites could be noted on maps and used for the initial identification. Fire suppression activities should not be delayed unless a cultural site is identified in the area. Additional measures should include training BLM staff to identify cultural and environmental resources, therefore facilitating resource protection and fire suppression activities.

- Heavy equipment, such as bulldozers, should be continually working once on site. Local heavy equipment resources should also be used since they have more of a vested interest in fire suppression in their area. Money should be spent to buy equipment that locals could use vs. paying for non-local operators.

- Better coordination is needed between local volunteer fire departments, the Nevada Department of Forestry, the BLM, the Forest Service and land management agencies adjacent to the Elko BLM District. In addition, an incident commander who cares about the local area and is accountable for the results of the team should lead the fire fighting efforts.

- It is more economical to redirect funding from fire suppression to fire rehabilitation. Efforts would then be spent rehabilitating an area rather than putting all fires out.

- Federal funding for fire suppression may be reduced in the future (in light of other world concerns), and fire suppression may have to focus on strategies to prevent catastrophic fires. Therefore, fuels should be reduced to minimize the need for such large-scale suppression efforts.

- It was agreed that prescribed burning was appropriate for some areas, and should be tried whenever resource specialists will allow it.

- When grasses are dominant, range management may be one tool to reduce fuel. It was suggested that sheep be used for grazing in areas where range management is needed.

- Green strips, generally ¼-mile wide, are another tool in fighting fire. The purpose of creating a green strip is to slow down the fire; therefore, flashy fuels within the strip must be eliminated. It was stated that the use of kochia (a broad-leaved herbaceous plant) in the green strip is effective, as this plant stays relatively green and provides food for wildlife. Green strips can be maintained by brush beating, prescribed fire and chaining. It was cautioned, however, that while green strips are generally effective, they cannot prevent very hot fires from moving through these areas.

September 27, 2001 at Jackpot, NV at Cactus Pete's Ballroom
Attendance: 4

- The BLM Elko Field Office should compare areas designated as "Fire Class A" (full suppression areas) with areas identified by wildlife biologists to be sage grouse habitat.

- Fire Class polygons include several designations (e.g., A, B, C, D and U) and subclasses. The District will be analyzing whether existing subtypes may be adjusted and how. Some existing polygons may be further subdivided to separate resources within an area (e.g., separate pinyon-juniper from mixed conifer); in other cases, existing polygons could be lumped if it is determined that the fire management strategy is effectively the same between neighboring polygons. In general, the subdivisions within a Fire Class were created to separate resources (e.g., cultural sites, cheatgrass, and big sagebrush areas) or geographic areas (e.g., Municipal Watersheds, Spruce Mountain, and Intermixed Woodlands, NE Corner), and as such, there is not a simple explanation of what defines the subtypes.

- The Fire Management RMP Amendment should include an explanation of what future conditions would lead to the reclassification of any Fire Class to another (i.e., Fire Class B to Fire Class A or C). The Amendment should include a table summarizing what each Fire Class is, and the varying combination of events that would lead to reclassification of the Classes.

- Improvements have been made in the delays caused when a cultural resource specialist must evaluate the area for cultural resources prior to beginning suppression activities, which could lead to disturbance. Now, the incident commander generally undertakes the role of the cultural resource specialist and, in some cases, may be able to assess an area for the occurrence of cultural resources.

- The challenge of preparing the Fire Management RMP Amendment was appreciated. In order to address fire management, the Amendment must address all resources, which is a comprehensive and complex task.

- Plant community restoration is important for the long-term viability of an area, and vegetation attributes that indicate the plant community has been restored are independent of those for grazing. It was suggested that the post-burn monitoring guidelines used by the BLM be included in an appendix to the Fire Management RMP Amendment (e.g., aspen must attain a specific height before grazing can return). These guidelines should be used to determine when post-burn grazing can occur.

- The BLM should get the consent of the leasee prior to conducting vegetation treatment in an area. The BLM strives to gain the support of affected interests in order to achieve resource management objectives.

- The resource management objective in an existing cheatgrass area, which has a low-grazing capacity, is to improve the vegetative cover. That objective is aimed at the long-term viability of the vegetation and is not an objective to improve grazing.

September 28, 2001 at Wells, NV at the Wells City Hall
Attendance: 21 members of the public

- The landowner (or permitee) should be allowed to accompany the District's suppression operator.

- The 2-year rest from grazing post-fire is too long. Although restrictions need to be applied, it would be preferable if use of the land could be regained sooner as circumstances allow. For instance, restrictions during the first spring are understandable, but it seems logical to allow cattle to return to the area by September, just like wildlife return to an area post-burn. During the second spring post-burn, cattle could be restricted again. The BLM responded by saying that there are several instances where permitees have been allowed to resume grazing after a fire before two years have passed. It should also be understood that there may be cases where a 3rd year of rest may need to be imposed. The 2-year rest is a recommendation, and overall, flexibility on when grazing may occur is allowed.

- Cattle are an effective means of knocking seed off of the plant and working it into the ground. Thus, if you remove cattle, this action is also removed.

- Landowners should be provided information relating to the seed mixes used for rehabilitation. These mixes should never be entirely sagebrush and should include grasses. One characteristic of a successfully rehabilitated site should be the regeneration of a relatively diverse vegetation community. The degree of diversity preferred may vary from site to site; however, the structural diversity that is obtained from including some woody component to the seed mix is generally a positive attribute. In many cases, the goal is to re-establish sagebrush habitat; however, grasses would typically still be included in the seed mix. Another positive component of seed mixes is Kochia because of its high protein content. Inclusion of this plant in the seed mix can increase the utilization of an area within one year as compared to areas where it was not used.

- The BLM cannot do anything in Wilderness Study Areas (WSA) that would reduce the suitability of the WSA to function as wilderness. In particular, the BLM is not supposed to enter a WSA with mechanized equipment to perform suppression measures. These areas are designated based on Section 603 of the Federal Land Policy and Management Act and Section 2(c) of the Wilderness Act of 1964. Since this designation is made by federal law, the Fire Management RMP Amendment process cannot modify this designation. The public could encourage Congress to resolve or modify what is allowed in WSAs.

- A clear chain of command should be used to organize and direct local resources to attack the fire first. The BLM should only bring in help from outside the area as a last effort. The government should not make a business out of suppressing fires.

- The BLM should conduct more joint training, especially with volunteer fire departments (VFD). Training sessions should be held during evenings or weekends because most of those who participate in VFDs cannot attend weekday classes.

- Aerial attacks could be more effective. The ideal time to schedule an air attack is during the morning when the air is calm.

- The amount of money spent by the BLM on fire fighting seems too high. This amount could be reduced if some of the money went to local VFDs; they have more of a vested interested in suppressing the fire efficiently and could possibly do so more cost effectively.

Issue Exercise

During the public meetings held on September 25, 26, 27 and 28 in Elko, Eureka, Jackpot and Wells, attendees participated in an issue identification exercise for the Fire Management Amendment. Each person was asked to write down the issues or suggestions they have for the Amendment. If a comment was already on the presentation boards, they were asked to place a green dot adjacent to it if they supported the comment and a red dot if they did not. The following table lists (in ascending order of concern) issues/comments received or supported during the public meetings.

- Citizens would like to see more use of the local community to fight fires. Reasons cited include reduced cost, more local knowledge, more equipment and faster response time.
- Allow more dormant season grazing use after a burn. Do not simply close allotment for 2 years following a burn.
- The local community would like to see greater use of grazing to manage fuel loads.
- The use of prescribed fire, mechanical manipulation and herbicide are acceptable means to manage high fuel load areas.
- Local ranchers would like to see the development of forage banks provided in the event of the loss of grazing land.
- Land should be managed for wildlife and ranching.
- Citizens expressed concern over the present economic incentives to allow burns to grow larger, thereby creating more jobs to manage and fight the fires.
- The historic and natural burn cycle should be re-established.
- Citizens expressed concern over delays in fighting fires due to cultural resource investigations.
- The protection of livestock forage should be a priority.
- Once equipment has been deployed to a fire, there should be no delays in its use.
- The impact of fire management strategies on local economies must be a priority.
- People would like to see more public education regarding fire management, especially for isolated communities.
- Citizens would like to see more rapid and larger response utilizing local forces to put out fires in a timely manner.
- Residents are concerned with the threat of fire to home and property.
- Management should utilize bombers/helicopters to put out fire quicker.
- Emergency stabilization and rehabilitation after fire should be a priority.
- Citizens feel that fire suppression is an industry, and they would prefer to switch the economic focus to grazing for fire prevention.
- Grazing should be used to manage fuel in green strips.
- Citizens agree that invasive weeds should be controlled after fuel management prescriptions and fire.
- Nevada Department of Forestry should work in a conjunction with the BLM.
- Outside tactical leaders should be accompanied by a local liaison to explain local conditions.
- The protection of big game habitat should be a priority.
- Use of grazing should be balanced with the management of wildlife habitat.
- Grazing for fuel management does not work with sagebrush and pinyon juniper.
- Costs could be minimized by prioritizing which fires to suppress.
- The timing of reseeding is important for rehabilitation.
- Citizens feel that the limitations put on ranchers do not help fire management.
- Overgrazing will not improve resource health.

- Pilot studies using alternative management techniques to test ideas should be implemented (Battle Mountain and Cottonwood Ranch).
- Herbicides should be used to create breaks and for fuels reduction.
- Forested areas should be allowed to burn.
- FMA should include method to track historic fires. The same places are burning and frequency is increasing.
- Dispatch is doing a great job.
- Plans should be integrated with adjacent districts.
- FMA should include provisions for fighting fires in Wilderness Study Areas (WSA).
- It was agreed that management of blowing dust and ash should be included.
- FMA should plan for a lower level of federal funding.
- Riparian areas should be protected.
- Sensitive species habitat should be protected.
- Watersheds should be protected.
- Citizens agreed that they would like more communication.
- Residents would like to see more money put into rehabilitation instead of suppression.
- In areas where fighting fire would be difficult, they should be reclassified for a "lower" letter - B to C – allowing some fires to burn.
- There should be accountability for decisions and for results.
- Add more firebreaks to reduce the risk of large fires.
- FMA should address the visual impacts of fire management.
- Broaden suppression activities through additional funding.
- Consider potential landslides, erosion/sedimentation when looking at fire management strategies.
- Do inventories of cultural resources ahead of time.
- Integrate other planning activities, such as the Statewide Sage Grouse Management Plan.
- Fighting fire is more effective at night (5 pm to 5 am).
- Fire closure language should be revisited and clarified.
- Focus the protection of cultural resources to known significant resources.
- Improve the types of seed mixtures and communicate the type to ranchers prior to their use.
- Integrate volunteers fully with BLM staff. (e.g., bring Wells Volunteer Fire Department together w/ BLM, etc.)
- Define the impact of herbicide related to sage grouse.
- Keep website up-to-date regarding the status of existing fires (see Winnemucca for example).
- Landowners should work with the incident commander during a fire.
- Livestock should be allowed to graze on cheatgrass.
- Citizens believe aerial attack would be more efficient (better timing).
- Protection of artifacts/cultural resources should be a priority.
- Citizens agreed with protection of Humboldt River.
- Residents would like to see an evaluation of public vs. private firefighters.
- Livestock should be returned by 2nd growing season.
- Citizens expressed concerns over seeding sagebrush in areas that may not make sense.
- Define fire polygons associated with key sage grouse habitat.
- Should rehabilitated areas be changed from B to A ?
- All BLM policies need to be streamlined.
- The cost of suppression is escalating.
- Thinning in forested areas does not help.
- Use resources from all agencies to fight fires.
- Utilize existing studies/recommendations.

- Utilize livestock to establish seeds.
- Define why an initial attack would be conducted on a C or D polygon.
- Define why rabbitbrush/sagebrush is in seed mixes.
- Define why WSAs should burn in the right conditions.
- Wildlife managers need to be integrated in all processes.

These issues were considered in the development of alternatives. For example, grazing was considered as a tool in all alternatives.

Public Meetings – May 20, 21, 22 and 23, 2002

At each public meeting, Joe Freeland (Elko District Fire Management Officer) gave a slide presentation that included a description of the purpose and need for the FMA, the proposed alternatives and the preferred action. Mr. Freeland described how the draft FMA has addressed many of the concerns heard at the previous public scooping meetings. Mr. Freeland presented how the FMA provides a balanced, long-term approach to managing fire that stresses fire prevention activities and an appropriate response to fire. Mr. Freeland pointed out that the other alternatives do not fully address the concerns of public. Mr. Freeland also pointed out that the Amendment would not address large-scale changes or existing polices, but instead would focus on using available tools to help manage fire. Information from the public meetings will be used to refine the draft FMA and EA, available for public review in June, 2002.

Following is a summary of comments made by the public during each public meeting:

May 20, 2002 at Elko, NV
Attendance: 6 members of the public

- The Fire Management Amendment should stress the use of local resources to manage fire. The FMA encourages immediate response in most areas. An accompanying document, the "Fire Plan", prepared by the Fire Management Officer will outline the operational framework to implement components of the FMA, include response tactics.
- Due to the recent fire history, the loss of big game habitat is becoming an increasing concern. The FMA has addressed this concern by creating several new polygons focused on the preservation of critical big game habitat.

May 21, 2002 at Eureka, NV
Attendance: 5 members of the public

- Advance planning for allotments focusing on fire prevention activities should be conducted.
- The plan should include an alternative FMC for WSA's in case their status changes.
- Weed treatments should take into account fire prevention objectives.

May 22, 2002 at Jackpot, NV
Attendance: 0 members of the public

- No comments were made at this public meeting

May 23, 2002 at Wells, NV
Attendance: 2 members of the public

- Proposed rehabilitation efforts need to be clearly communicated to the allotment holder, including fencing location and seed mixes.
- The use of local resources and personnel should be encouraged. Personnel should be trained and equipment certified.
- A local liaison should work with the incident commander. When possible, the incident commander should be from the region.

Issue Exercise

During the public meetings held on May 20, 21, 22 and 23, 2002 in Elko, Eureka, Jackpot and Wells, attendees were asked to revisit the issues identified in the previous scoping meetings. Each person was asked to place dots beside the issue they wanted to reemphasize or to write down additional issues. The following table lists (in ascending order of concern) issues/comments received or supported during the public meetings.

- Citizens would like to see more use of the local community to fight fires. Reasons cited include reduced cost, more local knowledge, more equipment and faster response time.
- The local community would like to see greater use of grazing to manage fuel loads.
- Landowners should work with the incident commander during a fire.
- The protection of livestock forage should be a priority.
- Once equipment has been deployed to a fire, there should be no delays in its use.
- The impact of fire management strategies on local economies must be a priority.
- Improve the types of seed mixtures and communicate the type to ranchers prior to their use.
- Add more firebreaks to reduce the risk of large fires.
- Fighting fire is more effective at night (5 pm to 5 am).
- Livestock should be allowed to graze on cheatgrass.
- Protection of artifacts/cultural resources should not be a priority.
- Forested areas should not be allowed to burn.
- Fire closure language should be revisited and clarified.
- Allow more dormant season grazing use after a burn. Do not simply close allotment for 2 years following a burn.
- Land should be managed for wildlife and ranching.
- Define why rabbitbrush/sagebrush is in seed mixes.
- FMA should plan for a lower level of federal funding.
- Due to the recent fire history, the loss of big game habitat is becoming an increasing concern. The FMA has addressed this concern by creating several new polygons focused on the preservation of critical big game habitat.
- Advance planning for allotments focusing on fire prevention activities should be conducted.
- The plan should include an alternative FMC for WSA's in case their status changes.
- Weed treatments should take into account fire prevention objectives.
  Proposed rehabilitation efforts need to be clearly communicated to the allotment holder, including fencing location and seed mixes.

Federal Register Notice

Elko and Wells Resource Areas Management Plans, Nevada
[Federal Register: April 25, 2001 (Volume 66, Number 80)]
[Notices]
[Page 20830-20831]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr25ap01-78]

DEPARTMENT OF THE INTERIOR
Bureau of Land Management
[NV-010-2810-HT]

Elko and Wells Resource Areas Management Plans, Nevada

AGENCY: Bureau of Land Management, Elko Field Office, Elko, Nevada.
ACTION: Notice of Intent To Amend the Elko and Wells RMPs for Fire Management and Initiate a 30-day Public Review and Comment Period.

SUMMARY: The Elko and Wells Resource Management plans (RMPs) were completed in 1987 and 1983, respectively, for the former Elko and Wells Resource Areas of the Elko District of BLM. These two Resource Areas have since been combined into the Elko District which is managed by the Elko Field Office Since inception, the Wells RMP has been amended for elk, utility corridor, and wild horse issues, while the Elko RMP has never been amended. Neither RMP addresses fire management issues in a comprehensive way, and this lack of coverage has created management challenges for the Elko Field Office in recent years. Neither RMP anticipated the growing importance of the role of wildfire in natural and managed ecosystems, nor the increase in wildfire occurrence, intensity, and numbers of acres burned in the Elko District. This increase in wildfire activity has had serious impacts on natural resources, as well as on public land users who rely on these resources.

The proposed plan amendment to revise the Elko and Well Resource Management plans will provide fire management guidance to address issues raised by local state and federal agencies, county governments, Native Americans, ranchers, and environmental groups. Issues and planning criteria identified to date are listed in this Notice under Supplementary Information.

DATES: Meeting dates and other public participation activities will be announced in public notices, the local media, or in letters sent to interested and potentially affected parties. Persons wishing to participate in this amendment process must notify the Elko Field Office at the address and phone number below. Comments on the proposed issues and planning criteria must be submitted during the public review and comment period from April 23, 2001, to May 23, 2001. The public may review the Elko and Wells RMPs at the address below:

ADDRESSES: All comments concerning the proposed fire management RMP amendment should be sent to the BLM Elko Field Office at 3900 East Idaho Street, Elko, NV 89801.

FOR FURTHER INFORMATION CONTACT: Joe Freeland, Project Manager, Elko BLM Field Office, at the above address or at (775) 753-0308.

SUPPLEMENTARY INFORMATION: This Notice satisfies the requirements in the regulation at 43 CFR 1610.2(c) for amending Resource Management Plan. The 5th Year RMP Evaluation completed in FY 2000 for the Elko RMP identified fire management as an important issue that was not
adequately addressed in the RMP, and for which an RMP amendment was recommended. A similar 5th Year RMP Evaluation will be completed for the Wells RMP in FY 2002. However, since the Wells RMP also lacks any substantive coverage of fire management issues, it is reasonable to recommend that a fire management amendment to this RMP be completed during the same process to amend the Elko RMP.

Issues regarding fire management identified to date include:

1. Suppression Strategy: The Elko Field Office RMPs currently offer little guidance on setting suppression strategies to balance maintenance of healthy ecosystems dependant on fire with protection of other resources. While some public land users advocate full fire suppression on all public lands, others feel that wildfire is a natural process that should be allowed in some areas. Many ranchers propose intensive livestock grazing as a strategy to reduce fuels in fire-prone areas, while other advocacy groups are concerned about the impacts from
this proposed strategy on native vegetation and wildlife.

2. Prescribed Fire Use: The use of prescribed fire is currently an area of public concern due to recent publicity over escaped burns in Los Alamos and California. The Elko District could benefit from prescribed fire use in high fuel load areas to reduce the potential impacts from severe wildland fire and to improve habitat. Local residents need to be involved with all prescribed fire planning and support any proposed prescribed fire projects.

3. Conversion of Sagebrush Habitat: Wildlife managers throughout the Great Basin are concerned over the precipitous decline in sage grouse numbers in recent years, thus causing an increased demand for the protection of sagebrush habitat throughout Elko District. Wildfire can both improve and devastate sage grouse habitat. Managing this habitat in view of competing resource uses and the spread of invasive, nonnative weeds throughout the district is a challenge for local land managers.

4. Emergency Fire Rehabilitation (EFR): Some EFR procedures are controversial, including fencing recently burned and/or rehabilitated areas to prevent grazing on fragile re-vegetation, as well as seeding with non-native grass species which out-compete noxious weeds and cheatgrass. Fencing burned areas in wild horse Herd Management Areas can disrupt movement of wild horses and are not popular with wild horse advocacy groups. Livestock owners are also concerned about the economic impacts of some EFR projects on their livelihood.

5. Forest Resources: Declining forest resources throughout the district put remaining stands at risk. Some stands need fire to insure forest ecosystem health. However, extensive fuels buildup could cause high intensity fires, leading to stand replacement as well as firefighter safety issues. In addition, Native Americans have concerns over the health of pinyon pine tree stands, since the tree and its fruit are important in maintaining their traditions.

6. Invasive, Nonnative Weeds: The significant resources required to fight noxious weed and cheatgrass invasions requires the cooperation of all landowners in affected areas in the district.

Wildfire management is one of the most important factors affecting the spread of these weeds in the Elko District.

7. Fire Suppression Costs and Affect on Local Rural Economies: Although high suppression costs affect all taxpayers, many local rural communities depend heavily on the influx of dollars from fire suppression efforts. Less fire suppression could lead to the saving of tax dollars and the possible improvement of some habitat values, however, several local economies may be negatively impacted by any changes.

8. Community Assistance: Better communication, training, and cooperation with local communities would aid in reducing the threat from wildfire in the wildland urban interface, reduce arson, trespass, and negligence occurrence, and encourage fire prevention.

BLM planning regulations (43 CFR 1610) require preparation of planning criteria to guide development of all resource management plans, revisions, and amendments. Planning criteria are based on: standards prescribed by applicable laws and regulations; agency guidance; the result of consultation and coordination with the public and other Federal, State and local agencies and governmental entities and Native American tribes; analysis of information pertinent to the planning area; and professional judgment. The following preliminary criteria were developed internally and will be reviewed by the public before being used in the amendment/EA process. After analysis of public input, they will become proposed criteria, and can be added to or changed as issues are addressed or new information is presented. The Elko Field Manager will approve all planning criteria, as well as any proposed changes:

-- The fire management RMP amendment will be completed in compliance with FLPMA and all other applicable laws and regulations.
-- The Elko Field Office Planning Interdisciplinary Team will work cooperatively with the State of Nevada, tribal governments, county and municipal governments, other Federal agencies, and all other interested groups, agencies, and individuals. Public participation will be encouraged throughout the planning process.
-- The RMP amendment will establish the fire management guidance upon which the BLM will rely in managing the Elko District, for the life of both the Elko and Wells RMPs.
-- The RMP amendment process will include an Environmental Assessment that will comply with all National Environmental Policy Act standards. --The RMP amendment will emphasize the protection and enhancement of Elko District natural resources, while at the same time providing the public with opportunities for use of these resources.
-- The lifestyles and concerns of area residents, including livestock grazing, recreational uses, and other land uses, will be recognized in the amendment.
-- Any lands located within the Elko District administrative boundary which are acquired by the BLM, will be managed consistent with the amendment, subject to any constraints associated with the acquisition.
-- The amendment will recognize the State's responsibility to manage wildlife.
-- The amendment will incorporate the Nevada Rangeland Health Standards and Guidelines and be consistent with the Nevada Sage Grouse Management Guidelines.
-- The planning process will involve Native American tribal governments and will provide strategies for the protection of recognized traditional uses.
-- Decisions in the amendment will strive to be consistent with the existing plans and policies of adjacent local, State, Tribal and Federal agencies, to the extent consistent with Federal law.

Freedom of Information Act Considerations: Public comments submitted for this planning amendment, including names and street addresses of respondents, will be available for public review and disclosure at the Elko Field Office during regular business hours. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Dated: April 6, 2001.
Helen Hankins,
Elko Field Manager.
[FR Doc. 01-10210 Filed 4-24-01; 8:45am]
BILLING CODE 4310-HC-M

Elko and Wells Resource Management Plans Fire Management Amendment

Sample Newsletter

In July 2001, the Bureau of Land Management (BLM) initiated work on a Fire Management Amendment (FMA) to the existing Resource Management Plans (RMPs) for the Elko District. The Elko District is located in northeastern Nevada and includes both the Elko and Wells Resource Areas. Public meetings were held on September 25, 26, 27 and 28 in Elko, Eureka, Jackpot and Wells. The information obtained at these meetings assisted in the development of draft FMA strategies.

Air tanker near Elko and Mountain City. August 6, 2001
Photo: Shawn Gibson, Archaeologist, BLM Elko

Purpose of Planning Effort

This FMA is being developed to provide overall direction as well as define operational procedures for fire management activities within the Elko District. Development of the FMA is being guided by the following goals:

- **Provide for the protection of life and property.**
- **Provide for the protection of habitat required by special status species.**
- **Provide for safe and cost effective resource protection and enhancement.**
- **Reduce hazardous fuels.**

The BLM Elko District covers 12.5 million acres, of which approximately 7.5 million acres are managed by the BLM Elko Field Office. Cooperative initial attack agreements are in place with the Battle Mountain, Winnemucca, Ely, Salt Lake and Upper Snake River Field Offices of the BLM. In addition, there are cooperative agreements with the Elko Interagency Dispatch Center (EIDC), U.S. Forest Service, Bureau of Indian Affairs and the Nevada Division of Forestry (NDF). The Elko Field Office is considered to be one of the highest fire load field offices within the BLM. For the base period 1996 through 2000, the District averaged 32 fires that burned an average of 224,348 acres annually. Although wildland fires can occur on a year-round basis in the Elko District, the primary season extends from May 11 to September 27.

Public Scoping Meetings

You are invited to attend public meetings on the Elko/Wells RMP Fire Management Amendment. Four public meetings will be held:

May 20, 2002	**May 21, 2002**	**May 22, 2002**	**May 23, 2002**
Elko, Nevada	**Eureka, Nevada**	**Jackpot, Nevada**	**Wells, Nevada**
High Desert Inn	**Eureka Opera House**	**Cactus Pete's Ballroom**	**Wells City Hall**
3015 Idaho Street	**31 South Main Street**	**1385 U.S. Highway 93**	**1279 Clover Ave.**
Time: 7-9 PM	**Time: 7-9 PM**	**Time: 7-9 PM**	**Time: 7-9 PM**

The public is welcome to attend at any time during the two-hour meeting period. A presentation is scheduled at the beginning of each meeting to provide general information on the planning process. The meeting format is intended to promote interaction and provide opportunities to make written and verbal comments.

Overview of Process/Schedule

The overall planning process has focused on the development of an Environmental Assessment (EA), Biological Assessment (BA), and Fire Management Amendment (FMA). These documents have incorporated public and regulatory comments as well as guidance received through the initial public meetings. The Fire Management Amendment process will be completed within the next 6-month period. Project milestones will include:

- Project Initiation: July 2001
- Data Collection: August 2001
- Public Scoping Meetings: September 2001
- Draft FMA, EA, & BA: May 2002
- Public Meetings on Draft FMA: May 2002
- Final FMA: September 2002

Plan Development

A preferred direction has been identified based on information from a variety of sources, including phone calls, e-mails, public meetings, and letters from individuals and groups.

This proposed action in the FMA is a balanced approach to fire management, providing a range of appropriate strategies for fire management. The proposed action recognizes that wildfire can have a positive or negative influence on resources in the District, depending on geographic location, resources present, land use, fire size, desired vegetative goals, weather and existing fuel conditions.

The FMA uses a number of strategies to address general fire management, fire prevention, fire response and fire rehabilitation on public lands in the District. Implementing these strategies would begin in the year 2002. As illustrated in the attached map, fire response is primarily based on suppression and the protection of resources and property, but also allows some flexibility to use other strategies when appropriate (prescribed fire, fuel reduction, fuel breaks, green strips, clearing, etc.).

The FMA focuses on the integration of fire management strategies to improve the long- term management of fire.

It is anticipated that the upcoming public meetings and other opportunities to comment will lead to additional refinements of the draft FMA.

Photo: Bryan Day
National Interagency Fire Center

How You Can Be Involved

Numerous opportunities for public comment are available, including the upcoming public meetings. Anyone interested in this planning effort is also encouraged to visit the project web page at **http://www.nv.blm.gov/elko**. This site will contain information on current project activities and status, as well as a comment form.

Comments may be e-mailed to:

Joe_Freeland@nv.blm.gov

Or you may write to:

Bureau of Land Management
Attention: Joe Freeland
3900 East Idaho Street
Elko, NV 89801
Or phone: (775) 753-0200

Appendix 1 – Part B

Proposed Elko/Wells Resource Management Plan
Fire Management Amendment

Letters of Comment
on
September 2002 DRAFT

Letter A – U.S. Fish and Wildlife Service (USFWS)
Letter B – Nevada Division of Wildlife (NDOW)
Letter C – Goods From The Woods (GFTW)
Letter D – Nevada Division of Environmental Protection (NDEP)
Letter E – Committee for the High Desert and Western Watersheds Project (High D)
Letter F – Nevada State Historic Preservation Office (NSHPO)
Letter G – Wildlife Management Institute (WMI)
Letter H – Mark Belles (MB)

United States Department of the Interior
FISH AND WILDLIFE SERVICE
Nevada Fish & Wildlife Office
1340 Financial Blvd., Suite 234
Reno, Nevada 89502

December 13, 2002
File No. BLM 6-1

Memorandum

To: Field Manager, Bureau of Land Management, Elko Field Office, Elko, Nevada
(Attention: Joe Freeland, Fire Management Officer)

From: Field Supervisor, Nevada Fish and Wildlife Office, Reno, Nevada

Subject: Comments on the Elko/Wells Resource Management Plans, Draft Fire Management Amendment and Environmental Assessment

We have reviewed the Elko/Wells Resource Management Plans, Draft Fire Management Amendment (FMA) and Environmental Assessment (EA) dated September, 2002, and received for review by this office on October 21, 2002. The FMA has been prepared to address the need for an integrated approach to fire management, and the EA analyzes the potential impacts of implementing the FMA.

The project area is the Bureau of Land Management Elko/Wells District which is located in northeastern Nevada and includes Elko County and portions of Eureka and Lander counties. The Elko/Wells District encompasses approximately 12.5 million acres, of which the District manages 7.5 million acres. The FMA/EA consists of four key components to manage the occurrence and severity of fires in the District: 1) general fire management; 2) fire prevention; 3) fire response; and 4) fire rehabilitation. Our comments and recommendations on the FMA/EA are provided below.

General Comments

In general, we found the document to be well written and the analysis to be based on both the current understanding of the historical role fire played in the types of ecosystems found in the district and on the current status of the lands managed in the district. Based upon our review of the draft FMA/EA, we support the selection of the proposed action. This alternative provides a balanced approach between the need to suppress fire in some areas of the district, such as the urban interface, and the need to introduce fire back into the ecosystem, such as wilderness study areas.

Within Chapter 3, we noted that some sections include discussion of fire effects but others do not. For example, the sections on Air Quality and Soils give comprehensive descriptions of the effects of fire on those resources. However, the section on Migratory Birds has no discussion of fire effects, while the discussion of fire effects on Water Resources is included in Chapter 4. We suggest making the discussion of fire effects in Chapter 3 consistent from one section to another.

Additionally, some sections reference scientific peer reviewed articles while others do not. This makes it difficult to review the information provided not knowing if the information is based on science, experience, or speculation. We realize that all the topics included in the EA have not been studied scientifically; however, the source or rationale for conclusions made in the document should be stated clearly.

Use of adaptive management and monitoring are important management tools that should be incorporated into the proposed action. Adaptive management uses information from past management experience to evaluate both failure and success and to explore new management direction (Kershner 1997). Monitoring provides the information needed to evaluate management activities (Kershner 1997). We recommend that you have a monitoring plan in place that will allow you to track both natural and prescribed fire to determine whether or not implementation of the FMA is having desired effects. It may be useful to publish a yearly fire season report documenting how much area burned and where it burned, allotment openings and closures resulting from fire, rehabilitation efforts, and other activities. This document would assist both of our agencies in tracking the environmental baseline for the listed species and species of concern in the Elko/Wells District.

Specific Comments

Page 2-3. Last paragraph, 8th bullet.

Replace "Laotian" with "Lahontan".

The term "historic habitats" should be replaced by native range throughout the document when referring to Lahontan cutthroat trout (LCT).

Page 3-6. F. Water Resources, 3rd paragraph.

Impaired water bodies are listed in EPA's 303(d) list, not 3030(d) list.

Page 3-13. N. Migratory Birds.

A recent publication entitled "The role of disturbance in the ecology and conservation of birds" (Brawn et al. 2001) may be germane to the analysis presented in this section.

Page 3-15. P. Wetlands and Riparian Zones.

A recent publication entitled "Fire and riparian ecosystems in landscapes of the western USA" (Dwire and Kauffman in press) may be germane to the analysis presented in this section.

Page 3-20. Q. Vegetation-Pinyon/Juniper

A recent publication entitled "The role of fire in juniper and pinyon woodlands: a descriptive analysis" (Miller and Tausch 2001) may be germane to the analysis presented in this section.

Page 3-20. Q. Vegetation-Aspen.

There are copious amounts of scientific literature on the effects of fire on aspen stands. Relevant information may be found in Shepperd et al. 2001. We suggest you include additional discussion on the effects of fire on riparian cottonwood tree species *(Populus* sp.) (See Gom and Rood 1999).

Page 3-24. R. Noxious/Invasive Weeds

The second sentence states "available literature suggests that most noxious weeds occur on disturbed areas frequently used by livestock, wildlife and humans", however, the pertinent literature is not referenced here. Please provide documentation for this section.

Page 4-13. F. Water Resources.

This section describes the negative effects of fire on water resources. Post fire erosional processes that deliver sediment to streams over long periods of time due to the lack of revegetation, roads, or fire lines can have long-term negative effects on aquatic ecosystems (Lotspeich et al. 1970; DeByle and Packer 1972). However, short-term pulses of sediment and large woody debris, often associated with functioning terrestrial and aquatic ecosystems during post-fire landslides and debris flows, may be beneficial. Over time, large woody debris and sediment are moved downstream by fluvial processes which form productive aquatic habitats (Reeves et al. 1995, Benda et al. in press, Miller et al. in press; Minshall in press). The most effective way to reduce the negative effects of fires on aquatic systems is to protect the evolutionary capacity of these systems to disturbance (Bisson et al. in press). Restoring physical connections among aquatic habitats may be the most effective and efficient step in restoring or maintaining the productivity and resilience of many aquatic populations (Bisson et al. in press; Dunham et al. in press; Rieman et al. in press, Rieman and Clayton 1997, Pilliod et al. in press). We should focus on protecting aquatic communities in areas where they remain robust and restore habitat structure and life history complexity of native species where it is possible (Gresswell 1999). However, where restoring connectivity between aquatic populations is not feasible, active management to reduce the impacts of fires and fire suppression actions may be an important short-term conservation strategy (Brown et al. 2001; Rieman et al. in press).

Wildfire and fire suppression effects on aquatic biota should also be discussed in this section. Minshall et al. (1989) speculated that chemical toxicity from smoke or ash would cause fish mortality in second and third order streams. Ammonia and phosphorus levels have been documented to be above lethal limits to fish during fires (Spencer and Hauer 1991). Water temperature may also increase after riparian vegetation is burned; however, predicting the biological consequences is difficult (Beschta et al. 1987).

Macro invertebrates can also be affected by wildfires (Minshall et al. 1995, Minshall in press, Spencer et al. in press). The most ecologically significant change is an apparent shift in functional feeding groups from shredder and collector dominated communities, usually associated with allochthonous production from the riparian vegetation, to scraper and filter feeder dominated communities (autochthonous production from increased sunlight and temperature) (Jones et al. 1993).

The use of retardant and foams and construction of dozer lines in the proximity of streams are the primary concerns with fire suppression activities. The use of heavy equipment near streams may destroy riparian vegetation, disturb stream channels, and increase sedimentation. Fire retardants and surfactant foams are known to be toxic to aquatic organisms (Jones et al. 1989, Gaikowski et al. 1996a, Gaikowski et al. 1996b, McDonald et al. 1996, McDonald et al. 1997, Buhl and Hamilton 1998, Buhl and Hamilton 2000, Little and Calfee 2000, Little and Calfee 2002a, Little and Calfee 2002b, Little et al. 2002). We recommend inclusion of a discussion of these potential effects, and include a reference to the SOPs in Appendix 3 requiring a 300-foot buffer zone around aquatic environments when using these chemicals during suppression activities.

Page 4-28-29. M. Special Status Species, 5th paragraph.

We recommend that this section emphasize that to the greatest extent practicable, fire suppression and fire rehabilitation activities in the Elko/Wells District will conform to management recommendations and plans developed by local area planning groups working on the Nevada Sage Grouse Conservation Strategy.

Additionally, the EA references SOPs for sage grouse in Appendix 3, however, these SOPs were apparently omitted from appendix. We recommend adding sage grouse SOPs to Appendix 3 and listing all the measures for fire suppression and emergency fire rehabilitation that are provided on pages 13 and 14 of the Nevada BLM State Office Guidance for sage grouse habitats in Nevada.

Page 4-31. 2nd paragraph.

Replace "Lahanton" with "Lahontan".

Page A3-2. SOP #6. Stream flow will not be impounded or diverted by mechanical or other means in order to facilitate extraction of water from the stream for fire suppression efforts.

This statement contradicts Rehabilitation Measures on Page A3-3 #G which states impoundments or diversions structures constructed to facilitate extraction of water from the stream during fire suppression efforts will be removed.

We appreciate the opportunity to provide comments on the FMA/EA. If you have any questions or require additional information, please contact me or Chad Mellison at (775) 861-6300.

Robert D. Williams
Field Manager, U.S. Fish and Wildlife Service

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*All of the In Press Forest Ecology and Management citations can be found at http://www.fs.fed.us/rm/boise/teams/fisheries/fire/workshop papers.htm

STATE OF NEVADA
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December 11, 2002

Joe Freeland
Fire Management Officer
Elko BLM
3900 E. Idaho Street
Elko, NV 89801

Dear Joe,

The following represents further documentation of a pervious e-mail which was sent to you concerning the Draft Fire Plan Amendment for the Elko District. Again I'm sorry for such a late response. On page 2-28 under the heading Rangeland Health/Grazing Management the issue is wildlife use of fire closure areas.

> I realize that livestock interests pushed this approach. We have yet to see wildlife use compromise vegetative response to a burn like domestic livestock can and do. I think our position on this issue is that we don't want to see wildlife compromise the outcome of fire rehabilitation efforts and we would work within the public process with the Bureau to address the problem should it ever occur. I do object to the last two sentences "If big game and/or wild horse numbers are left to increase or just impact rehabilitation areas at current levels without controls, it could have a detrimental effect on the condition of the rangeland resources. In addition, potential grazing and browsing impacts on rehabilitation areas by wildlife and wild horses could also have an impact on existing and permitted livestock grazing levels." These sentences are redundant and imply that the Bureau and NDOW don't manage or don't want to manage these resources in the public's best interest. The bottom line is that the livestock industry feels that if they have to take the hit during fire closure, every one else should too regardless of documented problems. We will continue to work closely with the Bureau on monitoring of these burn rehabilitation areas in an effort to see that vegetative resources are given the best chance at recovery.
>
> While the plan addresses closure from livestock use for at least two growing seasons, it is my concern that in some instances two years may not be enough. Certainly we are beginning to see that once grazing is reauthorized on a burned area we cannot go back to business as usual (same number of livestock, same use dates). We may need to take a stair stepped approach in terms of numbers and a change in season of use. There is certainly no chance of post fire recovery in those allotments which still maintain season long use by domestic stock. Burned areas, especially areas which were in poor ecological condition prior to fire, are going to need additional long term changes in the way we graze domestic stock if we ever hope to promote full recovery. Joe, we greatly appreciate the opportunity to provide input into the District's Fire Plan.

Steve Foree, Supervising Habitat Biologist
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Elko Field Office
3900 Idaho Street
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November 20, 2002

Subject: **Elko and Wells Resource Management Plans Fire Management Amendment**

Joe Freeland
Elko District Fire Officer, Joe Freeland

Dear Mr. Freeland

I work with pinyon pine nuts harvested in Nevada, species p.monophylla. **Goods From The Woods**, my company sold 13,000 lbs of Nevada soft shelled pinon pine nuts in the course of 4 weeks in October 2002. The focus of my comments is the failure of this plan to include an analysis a significant resource, the pinyon pine nut. While on page 2-13 section C-notes that management objectives are for woodland products, the plan completely fails to address any aspect of pine nut production, treatment areas and tree stand age, cyclical production levels and subspecies of pinon. As such, the plan fails on its face to meet primary management goals.

Additionally, I wish to provide new information, which must be considered in the course of your planning. In particular, of the changing conditions in the Southwestern United States of pinyon forests. Because the Nevada pinyon ranges are subparts of larger ecosystems, it is important to examine and plan, based upon larger regional conditions and circumstances.

There has been **no harvest** of species **p.edulis pine nuts** for the last **three years.** The Arizona, New Mexico and Colorado Wildlife wild life species are in crisis as a result- of drought which has their food chain. The primary reason for the edulis crash is the draught, which is especially bad in the edulis forests. The lack of water has made the trees susceptible to insect infestation, which is destroying huge tracts of forest..

The Southwestern drought has put entire pinyon forest systems into jeopardy. In Arizona the pinyon forest already stressed by record-low rainfall, has been infested by a beetle wiping out sections of trees at a time [(2)] "We're talking statewide. How are we going to treat the whole state," said Joel McMillin, a U.S. Forest Service entomologist, noting that the bark beetle has spread to a landscape level." "**There is nothing that's going on nationwide that would be covering any kind of a problematic assessment within forest plans**." "It's got a stranglehold east of Walnut Canyon," Manthei said, noting the l00,000 dead pinyon juniper in the transitional forest area. 1.3 million trees have been ravaged in the Coconino National Forest alone, in an area ranging from Twin Arrows to Blue Ridge. [(3)] A pinyon pine group of 700,000 trees between Winona and Twin Arrows has fallen to the bark beetle, and the rim country alone has suffered losses as high as 500,000 acres.

These pinyon trees and their nuts, will not be replaced for 50 years, or 150 years in the case of p. monophylla. Therefore, the resource management plans need to be amended accordingly.

The relationship between pinyon nuts and migratory birds is well documented in Avian Impacts on Pinyon-Juniper Woodlands, Russell P. Dalada. Pinyon-Juniper Conference, 1984 p. 525. Collectively 70 species are known to breed in these woodlands. The larger the pinyon seed available, the better health one sees in these bird communities. No aspect of the relationship between pine nuts and forest animals has been considered in this plan. P.monophylla nuts arc becoming very important to the entire southwestern ecosystem. These migratory birds are going to rely upon the areas of pinyon forest with nut producing trees.

At this time, it is impossible to predict what numbers and types of wild life species may be migrating into Nevada, where there are pine nuts. While black bears are not currently included as inhabitants of this eco-system, I offer the following information as an example of the importance of indigenous nuts to animal populations. The natural diet of bears is 90 percent made up of nutritious plants - especially nuts, berries and grasses. Early-season frosts followed by the drought all but wiped out the bears' traditional diet. Those that didn't build up enough fat face starvation in their dens. Underweight females may end their pregnancies by reabsorbing their fetuses into their bodies or bear cubs too weak to survive.1 We personally provided 1,000 lb- of p.monophylla pine nuts, for wild life rehabilitation centers. and research protects involving wildlife, which would normally utilize p.edulis.

One indication of bears in search of food is human/bear encounters. Complaints about nuisance bears have soared by 7,000 percent in northern Nevada in the last 12 years.(4) In as much as a bear can travel 40 miles a day in search of food, it is not beyond reason, that some of these starving animals might end up in this region, looking for food.

I am offering the new information about the edulis harvest, together with realization that no problematic assessment address the larger issue of overall health of all pinyon species. This plan fails even to address, even in the simplest terms, the issue of pine nut production.

Additionally, the Nevada nuts are currently replacing the HUGE commercial market left void as the result of the p.edulis crises. In those traditional p.edulis markets, the whole sale price of p.monophylla went as high as $8.00 per pound. It is imperative that the resource management plans be revised to reflect the significance of the pinyon pine nut. Goods From The Woods, only marginally tapped into the market this year. Had we been aware of the huge demand for the nuts, we would have tripled our orders and sales. We discovered in October that there are hundreds of roadside venders who make a livelihood from the sale of pinyon pine nuts. The monophylla nut, was very successfully introduced as a substitute for the edulis. Thus, the economic impact of the woodland forest product plans must be revisited to include this new information. The fire plan would then-need to be revised accordingly.

Furthermore, plan has failed to take into account the following science:

PINYON PINE AND FIRE ECOLOGY

Singleleaf pinyon *(Pines monophylla,).* also called pinyon is a slow-growing. that grows on dry, low mountain slopes of the Great Basin.[5]

Singleleaf pinyon is one of the slowest growing conifers. It usually requires about 60 years to attain a height of 2 m (6.6 ft). [5] Generally, singleleaf pinyon trees do not begin bearing cones before they are 35 years old and do not begin producing good seed crops earlier than 100 years. Pinyon depends upon a standing crop of seedlings for species perpetuation. Seedlings require a nurse crop; thus, most seedlings are found under shrubs in mid succession and under the tree crown in late succession.[5]

Singleleaf pinyon trees more than 300 years old are fairly common on poor sues but rare on good sites. It appears that all the better sites were either burned in the past 300 years or have been cut over in the past century or so.[5]

The poorer sites are **virtually fireproof because** their sparse vegetation will not carry fire, and these sites were not cut because of the small size and poor form of their trees. [5]

Singleleaf pinyon communities does not carry fire well, and fire return intervals of several hundred years are considered typical [6-7]. For example, singleleaf pinyon communities in the San Bernardino Mountains have experienced long-interval stand-replacement fires both before and during suppression with an estimated fire interval of 410 years. Resulting in a mosaic of small scattered patches within uniform old-growth stands across the landscape [8-9]

Burning in pinyon-juniper woodlands requires at least 600 to 700 lb/acre of fine fuel [8]. In the absence of fire and the presence of grazing, tree densities have increased and undergrowth is so sparse in many areas that surface fuels do not support fire [9,10,11,12,14]

Susceptibility to fire depends on the stage of development of the pinyon stand. In young stands, enough shrubby and herbaceous vegetation often exists to carry fire over extensive areas. As the stand develops, understory vegetation becomes too sparse to carry fire, and the trees generally re too widely spaced to carry a crown fire except with the aid of extremely high winds (5). Thus, fire is ordinarily confined to younger stands and to a few individual lightning-struck trees in older stands.

In short, fire suppression efforts over the period of 30-40 years have had a minimal impact on the pinyon forests. However, massive vegetation conversion projects, prescribed burning, rangeland improvement projects have radically altered the region, as grassland development for cattle grazing has been the primary focus of land managers in the Western United States and the Nevada District as a whole. The fine fuel load of grasses, in particularly cheatgrass is the true cause of the catastrophic wild fire problem in Nevada.

> While the plan addresses cheat grass as a primary fire culprit, the vast amount of action, in terms of treatment is on other species of plants. In short, the plan correctly points out the problem, but rather than address the problem, it goes about its decades old cut the trees and make more range solutions. In short, this plan does next to nothing to correct the catastrophic circumstances creating the flash fuel loads. In fact the plan erroneously states that "live biomass" represents high fuel loads and greater risk of large fires. I will gladly provide citations on fuel loads and moisture content of live vegetation, in comparison to fine flash fuels, such as cheatgrass.
>
> Looking back into 2001 to fires in the Elko area, the Buffalo Complex fires. consisted of the Buffalo Fire and Hot Take Fire, both located about two miles south of Midas, Nevada. These fires covered 93,092 acres, yet this plan states, **"fire history is minimal"** p2-24, A 1 Urban Interface. That, like most large Nevada fires was a grassland fire:
>
> > *At first firefighter weren't sure what there was to save, as they traveled thorough parched range land and alongside the treeless Snowstorm Mountains and over drying creeks. This wasn't at all like the tall timber fires of the Pacific Northwest, where flames leap across trees and shoot 100 feet into the air. Here they saw fire sweeping across a desert floor that from a distance didn't even appear flammable" (LA Times 8/17/01)*
>
> Eight-hundred fire fighters received military assistance in battling this fire at a cost $1.7 Million. Similarly, the Spaulding fire was located thirty miles southwest of Winnemucca, Nevada, near the Clear Creek Fire occurred the same year.

The Spaulding fires burned through desert country with cheat grass, sagebrush and juniper. Small patches of forest, about 12% of the area inside the fire perimeter of 75,137 acres burned at higher elevations. Why treat trees (live biomass), when it is flash fuel which is the source of the problem?

I began correspondence with the Nevada BLM about my concerns ***in August of 2000*** about the number of forested public lands which have been deforested as the result of fuel reduction, maintenance, bush clearing and other treatment methods which favor grazing over sustainable forestry for these public lands. In particular the lack of consideration for the mature pinon pine trees, both from the commercial harvest and the obligatory species perspectives.

There exists only the most minimal research on p.mnnophylla seed production, harvest levels, and mature not producing, pinyon tree stands The entire Nevada BLM has repeatedly failed to consider the economic value of pinon pine nuts in its resource planning. This country imports between 5 and 8 million pounds yearly. It is a huge industry. Yet, the BLM is failing in every aspect to manage the resource. The management efforts have been to date concentrated upon the cattle industry. The amount of destruction to our public lands, by cattle grazing, is phenomenal. These practices are leading to a legacy of desertification of forested lands. All the while, the Nevada BLM has ignored a food source that is more efficient in teens of land use and protein produced The lack of care of the pinyon trees as a resource amounts to supreme negligence and waste (in legal context).

Very little is done to monitor harvest levels, and only a small percentage of harvested nuts are reported to the BLM. There has been a contrived effort to ignore the pine nut as a resource and I have found my company thwarted in participation in land planning involvement, time and main. Please read my web Rite, wwv.pinenut.com for a list of correspondence, which to date remains unaddressed.

Should you wish copies of the cited materials, please let me know. Thank you for the opportunity to respond to this plan. I received my copy of the plan, Monday November 18 and wrote these comments very quickly. I plan to amending them. after I have had an opportunity to consider the, plan in further detail.

Thank you. Penny Frazier

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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane, Room 138

Carson City, Nevada 89706

November 14, 2002

Joe Freeland
Forest Management Officer BLM -
Elko/Wells District 3900 E. Idaho Street
Elko, NV 89801

Dear Mr. Freeland:

After reviewing the Elko / Wells Resource Management Plan (RMP), I have a few general comments to share. The proposed alternative, if executed in accordance with the State Smoke Management Program, (SMP) is sensitive to some of the air quality concerns that we have for the Elko/Wells district.

We appreciate Elko/Wells district has cooperated with the Nevada Bureau of Air Quality Planning (BAQP) in previous planning efforts. However, BAQP does have concerns about smoke impacts for sensitive areas in the Elko/Wells District. In addition, we are concerned that the prediction of future wildfire acreage is inconsistent with the proposed alternative.

I. Comparison of PM-1 O emissions from wildfire versus prescribed fire

The Elko/Wells RMP states that prescribed fires generate 70 to 75 percent of the PM 10 emissions per acre when compared to wildfire. However, wildfires generally burn more intensely and occur in July or August, which allows for a higher plume height and more effective smoke dispersion. By contrast, the season for prescribed burning in the Elko/Wells district is during the fall. Smoke dispersion is generally much poorer in the fall due to thermal inversions and lower fire intensity. Therefore, even though a prescribed burn may produce less PM 10, the risk to nearby residents and affects on visibility may be greater.

I I Cumulative Impacts

BLM may be compelled perform multiple prescribed burns in close proximity to meet higher prescribed burning goals. The RMP has no discussion of possible impacts that could result from multiple prescribed burns. Additionally, there is no discussion of possible cumulative impacts resulting from multiple prescribed burns and preexisting air pollutants. As stated in the report, a detailed discussion of cumulative impacts at the level of this report would be unreliable. However, a commitment to perform cumulative impacts at a site-specific level should be made in the report.

[1] The smoke management program document is available online at http://ndep.state.nv.us/bagp/snioke2.htni

III. Monitoring

The RMP states that burns lasting longer than 1 day will be monitored to ensure that the burn does not adversely affect sensitive receptors. What are the details of the proposed monitoring in terms of equipment and design? How will adverse impacts be assessed - is there a specific threshold that is designated as an unacceptable impact? Do impact thresholds vary by area (i. e. Class 1 vs. Class 2)?

IV. Future wildfire acreage projections

In several sections of the document, it is stated that the prescribed burning, as outlined in the preferred alternative, will lead to a decrease in wildfire acreages. For example, Table 4-1 of the RMP shows potential acreages affected by wildfire and prescribed fire under the various plans. In the proposed action, a 20 percent decrease in wildfire acreages is predicted to occur over the next 20 years (see Table 4-1). This prediction is over optimistic, and could only be achieved with a much more extensive prescribed burning program than is currently proposed.

Utilizing the following conservative assumptions, we can calculate a baseline fire average in the Elko / Wells District:

- The district consists of 7.5 million acres, of which 6 million acres have excessive fuels when compared to baseline conditions.
- 30-year return-fire interval (There is a wide range of baseline fire return intervals on the district - 30 years seems to be a conservative value for purposes of this calculation).

Therefore, in a `natural' fire regime, an average of 200,000 acres would burn in any single year (6 million acres/30 years = 200,000 acres/yr).

According to Table 4-1, following practices in the proposed action over the next 5 years, less than 100,000 acres/yr will be subject to any type of fuel reduction (i.e. prescribed fire and wildfire). There will be a continuing `backlog' of 100,000 acres per year - this acreage suffers from heavier than baseline fuel loads, will remain untreated and accumulate additional fuels, and will likely burn in a wildfire over the next 20-30 years.

Additional evidence against this prediction can be found by examining the past 10 fire seasons (1993-2002). During the past decade, wildfires have burned an average of 110,000 acres on the Elko/Wells district - this is well over twice the projected annual wildfire acreage during the next 20 years. These severe fire seasons could be connected with global warming or critically heavy fuel loading. If either explanation holds any credibility, wildfires will burn more acreage over the next 20-30 years under the practices of the proposed plan.

V. Potential formation of cheatgrass dominated ecosystems

With increasing acreage subject to larger prescribed burns, we are also concerned that the prescribed burns will be of higher intensity to allow a lower per acre cost for prescribed burning on a larger scall recommended in the plan. The more intense prescribed burns may lead to additional cheatgrass invasion. Additionally, as a result of the additional wildlife acreage, more areas may become dominated by cheatgrass following wildlife events.

As noted in the report, cheatgrass burns more frequently and intensely compared to native vegetation, increasing the average acreage burned annually. Currently, there are 365,000 acres of cheatgrass, which burns every 3-5 years. Using the same formula as in Section IV, we can expect an average annual cheatgrass burn of 91,250 acres (365,000 acres/4 years). In addition, we are concerned that future large wildfires may lead to more cheatgrass dominated ecosystems.

VI. Class I Areas

By virtue of being a Class I Area, BLM cannot contribute to increment violations or to negative effects on AQRV's in the Jarbidge Wilderness Area. How will the BLM avoid degradation in Class I areas?

VII. Pre-Existing Air Quality

The report states that: "Because wildfire is a natural part of the vegetation communities within the Great Basin, the effects of smoke on air quality can be considered a part of pre-existing air quality conditions." However, Nevada BAQP distinguishes between smoke caused by wildfire (natural) versus smoke caused by prescribed burning (anthropogenic). Therefore, it is not reasonable to equate smoke from prescribed fire with smoke from wildfire.

If you have any questions, please contact me at (775) 687-9358 or at jacksons@ndep.state.nv.us.

Samuel Jackson
Smoke Management Coordinator
Sergent, NDEP,

November 14, 2002

Helen Hankins
BLM - Elko Field Office 3900
E. Idaho St. Elko, NV 89801-
4611

Here are comments of the Committee for the High Desert and Western Watersheds Project on the Elko BLM's "Elko/Wells RMPs, Draft Fire Management Amendment and EA".

First, we are unclear what this document is - Is it an RMP amendment, or is it a programmatic EA that amends existing fire plans? You must prepare an EIS - an EA is inadequate to cover the vast acreage of public lands and the large number of environmental effects of the broad array of actions that are proposed in this document. All direct, indirect and cumulative impacts must be assessed.

The EA fails to provide current and basic information on the soils, watersheds, native vegetation, wildlife habitats and populations, recreational uses, and other important values of the affected lands. Basic information on ecological condition/seral status of vegetation is not examined. Such information is necessary to ensure protection of values under various fire and vegetation treatment schemes.

The EA fails to provide or rely on any current information that assess the degradation of lands and waters in the affected lands by livestock grazing Since livestock grazing occurs on virtually every square inch of Elko BLM lands, it a is a major disturbance factor, and a major case of weeds, altered fire frequencies, "dense" wood vegetation/hazardous fuels and other conditions this EA discusses, or needs to discuss.

There is an appalling lack of documentation of the condition of grazing-damaged watersheds throughout EA lands. Before BLM can make a decision in this programmatic document to place a land area in a particular fire suppression/fire prescription category, it must first assess the susceptibility/vulnerability of watersheds to erosion following fire-induced disturbance.

Likewise, BLM must assess the vulnerability of all lands placed in various fire management categories to weed invasion following fire or other disturbance There is a clear example of how this can be done in ICBEMP that you have chosen to ignore.

Many elements of the EA ignore the current body of scientific knowledge about the susceptibility/vulnerability of Wyoming big sagebrush and other low elevation native shrub communities to weed invasion following fire. See, for example, your proposal to burn portions of the Owyhee Desert. Such gross failures on BLM's part can only be seen as efforts to placate the livestock industry (Petan and Agri-Beef in the case of the Owyhee Desert), by clearing the way for widespread burning of lands destined to suffer cheatgrass, whitettop and other exotic species invasions following fire.

This EA can not be tiered to the long-outdated Elko and Wells RMPs, as they do not contain a current inventory of BLM lands.

1-3 lists use of grazing to manage fire. There is no valid scientific basis for claiming that grazing can aid in suppression of fires. If that is the case, most of the lands in the Elko District would not have burned - as many areas, at the time of burning, were grazed to ground level. Plus, the mid and long-term consequences of intense grazing in arid lands in inevitable soil erosion and weed invasion.

The EA places an inordinate emphasis on use of exotic species. There are plenty of native species that fill the same role as the exotics you propose to use. You fail to use natives because

their successful establishment requires extended periods 5-10 years or more - of rest from grazing. Native Poas, winterfat and other species should he used in arid low elevation lands.

Forage kochia is an invasive, aggressive exotic that is becoming a weed and threatening rare plant and other important habitats on the Snake River Plain. Your EA will seed it over broad areas of public lands, and result in likely infestations of kochia over vast areas.

We have spent a lot of time on the ground in Elko BLM-managed lands, and have been appalled at the widespread and unaddressed livestock damage to these lands. The ancient RMPs fail to put in place standards of protection necessary to both prevent continued and ongoing livestock damage to these lands, as well as to allow recovery.

The RMPs are so woefully outdated that few if any ORV constraints exist on the affected lands This means that recently burned areas can be crisscrossed by ORVs, and/or new reading develop, and BLM land use plans permit such activities.

Throughout, the analysis, BLM fails to adequately assess the impacts to species dependent on mature or "old growth" communities. While a "mosaic" may create habitat for weedy or generalist species, many species are dependent on intact mature or old growth sagebrush, juniper, pinyon-juniper, mountain shrub, and other plant communities. In many instances, creating a "mosaic" for weedy species like deer mice simply results in fragmentation of habitat for native species like sage grouse and sage-steppe obligate migratory songbirds.

The EA makes reference to burning aspen to get regeneration. This is hogwash. Elko BLM is well aware of the Nevada aspen study by Dr. Charles Kay where Dr. Kay's extensive review of exclosures in Nevada found that exclusion of herbivory (cattle and sheep) resulted in aspen regeneration. Burning aspen destroys important wildlife habitat and beautiful trees important to recreational users of public lands. Your failure to include reference to this work, and continued reliance on out-dated notions of a need to kill aspen to stimulate sprouting, is just one example of your failure to include current science that does not support a large-scale use of fire in the arid West.

Elko BLM has already done some projects discussed in the EA - for example - mowing greenstrips in sagebrush near Midas. We have noted an abundance of cheatgrass in the mowed areas, compared to outside areas. Before you can adopt any of these techniques, we ask that you first assess past problems/successes/failures in areas you have managed.

An example of BLM's abysmal failure to even begin to control livestock grazing in any post-fire environment is that of the Cottonwood allotment in O'Neil Basin. Here, Elko BLM has actually issued TNR grazing use on recently burned lands, and allowed the wanton destruction of burned Goat Creek lands. Also, Elko BLM frequently fails to close important burned areas if lands have not been almost entirely incinerated. We ask that you examine an alternative that closes ALL burned lands from grazing for at least five years following fire.

We are alarmed at increasing mortality of pinyon pine in northern and central Nevada. You must include a current assessment and inventory of this species and its health before you can include it any polygons slated for burning. In addition, for this and other vegetation communities, we ask that you provide maps that show the current extent of past manipulation/seedings/ treatments over the potential habitat of the species This is necessary to understand how much pinyon-juniper and other communities have already been altered.

The EA repeatedly talks about the need to increase diversity. Your analysis fails to take into account the inherent natural diversity that often exists in sagebrush communities, as well as the complex interspersion of many other vegetative communities that vary within localized geographic areas depending on soils, aspect, and other factors.

Some specific comments:

Maps are very difficult to read at such a small scale, with few identifying features and as black and white. We ask that maps be redone as part of a Supplemental EA/EIS released for comment. Since identifying lands to be placed in a particular category is an important part of the EA, these maps must be comprehensible to the public. Maps omit key information such as overall land condition/ecological status, amount of land area seeded to exotics, already invaded by weeds, likely to be invaded by weeds with fire disturbance, and the like.

p. 1-4 - Does the EA cover ALL 12.5 million acres?

p. 1-9. The EA fails to discuss many negative effects of prescribed burning -additive disturbance of fire and grazing to plant communities, likelihood of increased roading from prescribed fire activities.

p. 1-10. You discuss "timing". What you fail to discuss is the TIME and changes in livestock grazing practices, including pre-fire/pre-treatment changes - necessary to ensure adequate vegetative recovery post-fire.

p. 2-4. We do not believe your proposed action is a balanced approach. Instead, it seems designed to speed up the spending of large amounts-of federal fire funds in "treating" lands, while failing to address the causal elements (livestock grazing, roading, other disturbance that have caused altered fire intervals, increased densities of woody vegetation, etc.

p. 2-6. All grazed lands should at least be put in the "areas where ... various factors place constraints on fire use". We do not believe there are any FMC D lands in the Elko Field Office, as all lands that you manage have serious health problems due to grazing. This first needs to be addressed before fire disturbance occurs.

p. 2-7 states that the polygons refine the strategy based on resource value, vegetative response, potential for invasive weeds and public safety. Please provide us with a detailed explanation of how this was done for each polygon as part of a Supplemental document.

We support a suppression alternative until BLM can successfully reign in abusive grazing practices on Elko Field Office lands.

p. 2-9. We believe, and science supports, that there should be many constraints on vegetative manipulation in lands with cheatgrass.

p. 2-13. You have greatly erred in your description of the Owyhee desert. We simply do not believe that most of the area receives 10-14 inches of precipitation per year. There is very little mountain big sagebrush here - it is nearly all Wyoming and Basin big sagebrush and some low sagebrushes. The presence of abundant Wyoming and mountain big sagebrush - all of which is highly susceptible to invasion by cheatgrass, bur buttercup, white top and other exotics - means that you can not say that it has a potentially high vegetative response [to treatment with fire]. Instead, it is much threatened with exotic species proliferation in a post-burn environment, and should not be subject to prescribed burning. The old BLM assessment for the Owyhee allotment is now out-dated, was extremely biased towards production of cow forage, and can not be the basis for your analysis here. Plus, there are large areas that have burned and have invasive species problems.

p. 2-15. We oppose a "goal" for mixed woodlands - or any area - of "providing livestock forage". This should not be a goal of a fire planning effort.

p. 2-16. Pre-settlement fire (Owyhee WSA, elsewhere) can not be a management goal, as pre-settlement vegetative conditions do not exist. Until BLM brings about pre-settlement vegetative conditions, it can not impose an "unnatural" pre-settlement fire regime on these lands.

p. 2-17, 2-18. Dead down and standing trees provide important habitat and are critical for proper nutrient cycling. Your proposal to burn up these scarce high elevation lands is flawed. Again here, pre-settlement vegetative conditions do not exist, largely due to livestock grazing, so pre-settlement fire regimes are not applicable.

p. 2-18. BLM's "Fire Prevention" strategy (of intensive veg. manipulation, fuels reduction, green strips, etc. fails to address the CAUSES of any fire problems.

p. 2-22. Removal or lessening of livestock grazing should be listed as a fire prevention activity, as livestock grazing disturbance cases cheatgrass and other weed invasion, and prevent the recovery/restoration of native species.

p. 2-23. We support maximizing fire response.

p. 2-25. We do not support 2000 acres unplanned ignition caps for the Owyhee Desert, Little Humboldt-WSA, Goshute, South Pequop and Bluebell WSAs. We support the 300 acre figure, and think it should be applied throughout. We commend your analysis of woodlands and intermixed woodlands!

We support spending large amounts of federal fire funds in trying to restore degraded low elevation cheatgrass and crested wheatgrass lands.

Please refer to our earlier comments submitted during scoping. Sincerely,

Katie Fite
Committee for the High Desert
PO Box 2863
Boise, ID 83701

Jon Marvel
Western Watersheds Project
PO Box 1770
Hailey, ID 83333

DEPARTMENT OF CULTURAL AFFAIRS
Nevada State Historic Preservation Office
100 N. Stewart Street
Carson City, Nevada 89701

November 6, 2002

Joe Freeland
Fire Management Officer Bureau of Land
Management Elko Field Office 3 900 E.
Idaho Street Elko, NV 89801-4611

Dear Mr. Freeland:

> I have reviewed the second draft of the proposed fire management amendment and environmental assessment for the Elko and Wells Resource Areas. The BLM has adequately identified the kinds of properties that could be affected and the means of preserving them. Staff did a fine job of synthesizing known information on the effects of fire on cultural resources. We would like to thank the BLM for including us in this effort and remind BLM staff that the use of the GIS database (the Nevada Cultural Resources Information System) will make background literatures searches easier.

We have no other comments at this time. Sincerely,

ALICE M. BALDRICA, Deputy State Historic
Preservation Officer

Wildlife Management Institute

Len H. Carpenter, Field Representative
4016 Cheney Drive, Fort Collins, CO 80526
Phone (970) 223-1099 Fax (970) 204-9198
e-mail: lenc@verinet.com

ROLLIN D. SPARROWE
President

RICHARD E. McCABE
Vice-President

October 29, 2002

Joe Freeland.
Fire Mgmt. Officer
BLM Elko Field Office
3900 East Idaho Street
Elko, NV 89801

Dear Mr. Freeland:

I am the Southwest Field Representative for the Wildlife Management Institute. The Institute is a private, nonprofit, scientific and educational organization founded in 1911 and dedicated to the restoration, conservation, and sound management of natural resources, especially wildlife, in North America. Following are my comments on the draft document updating the Elko and Wells Resource Management Plan (RMP), Draft Fire Management Amendment and Environmental Assessment.

First, it is good that the Bureau is updating these plans. It is important that plans be current and address pressing issues like fire rehabilitation. It is also critical that RMPs be based on the latest federal laws, regulations, standards, guidelines, and policies.

Overall, the draft amendment and EA are well done and inclusive. I find the four alternatives reasonable and they provide a good range for decision makers to choose from. It appears that the preferred alternative offers a good blend of fire management strategies.

Concern for sage grouse and their habitats is a big issue today. The document reveals that guidelines developed for sage grouse in Nevada will be incorporated into the plan as will the recently adopted sage grouse guidelines that were developed by the Western Association of Wildlife Agencies and published in the Wildlife Society Bulletin (28:967-985). This is very good and efforts must be taken to ensure these guidelines are followed once the plan is amended.

Rehabilitation of burned areas is a critical issue and the draft document presents only a generic description of this process (see pages 2-26, 2-3L, 2-36, 2-39). 1 would like the final draft to be more specific and emphatic on how previously burned areas will be rehabilitated under each alternative. It is important that the Bureau take a very aggressive approach to rehabilitation.

Cheat grass invasions after fires are a significant problem for both sage grouse and mule deer and the final plan must address how the rehabilitation plans will address this critical issue. I also find that the amended plan does short thrift on the bigger problem of noxious and invasive weeds in general. I strongly suggest the final document provide at least one specific section detailing how invasive weeds will be dealt within the revised plans.

It is good the plan states that the Bureau will take necessary steps to address habitat needs of all threatened, endangered, and sensitive plant and animal species. Management strategies chosen must not cause these species to be further impacted.

It is also important that strategies on grazing management presented on pages 4-45 to 4-47 be followed. This will involve close monitoring of existing grazing allotments. I find the document lax in addressing the overall issue of monitoring. I suggest the final plan must address monitoring in general and identify key monitoring elements in some detail. Furthermore, the revised plan must address how monitoring data will be incorporated into individual grazing allotment plans. It is critical that the revised plans have built-in evaluation standards.

In summary, it is important that the key objective of this revised plan be maintenance of the sage brush-steppe ecosystem so that important functions continue. The bottom line is that soil stability, watershed health, and ground cover on the public lands all are within ranges that promote sound ecosystem function. Appropriate management of both wild and prescribed fire is critically important to achieving this objective.

Thanks for the opportunity for comment. Please be sure that I receive any future documents related to this plan update.

Sincerely,
Len H. Carpenter

cc:
R. Sparrowe, WMI

21 October 2002

Mark Belles
9318 Willard Street
Rowlett, Texas 75088

BLM Elko Office
Attn. Joe Freeland
Fire Management Officer
3900 East Idaho Street
Elko, Nevada 89801

Dear Mr. Freeland,

Thank you for the draft copy of the "Elko/Wells Resource Management Plans, Draft Fire Management Amendment and Environmental Assessment." Please note that all references cited in this letter are to the foregoing document. Please retain my name on the mailing list for this project

I am pleased to see that the BLM is starting the re-evaluation of its Fire Management Plan for the Elko and Wells Resource Management Areas. While I strongly support the reestablishment of natural fire conditions, I do recognize the importance of suppression in localized zones near improvements or historic and cultural sites,

It is disturbing to find a statement in the Purpose and Need section (page 1-1) that, in the midst of stating the purpose of the project, flatly declares that "In most cases, fire will be suppressed immediately, ." This sort of statement, before any discussion of the alternatives or supporting studies cause the reader wonder whether the documentation that follows is merely a facade to decorate a forgone conclusion.

A careful evaluation of the situation on the ground" shows that firm action must be taken to reduce the fuel loads. Past efforts at reducing the fuel loads have been largely unsuccessful (page 1-9, first paragraph). Chaining, aerating and use of the dixie harrow have been shown to be very damaging as a disturbance process and should not be considered for fuel reduction purposes (Page 2-20)

Page 1-2 claims that the document will evaluate the funding mechanisms associated to implement the FMA. Maybe I missed it, but I don't find this analysis in the document. The costs of fire suppression are well known and will continue to rise in the absence of reestablishment of a natural fire regime_ Short term costs associated with this reestablishment may be high as well, but will fall as the ecosystem returns to each natural state

A comparison of the Proposed Action to the No Action, Full Suppression and Limited Suppression alternatives shows that the methods authorized by each alternative are nearly identical, the primary distinction between there helm' the percentage of the effected area that full into the four Fire Management Categories.

Comments related to the Proposed Alternative

I) A careful review of the defined polygons shows that the analyses of only a few justify the full Fire Suppression activities. They are as follows, with the noted reasons,

A-I: Urban Interface
A-3. Watershed protection
B-4: Protection of private land

These areas total 1 36 million acres.

2) Additionally the analysis of some polygons justify suppression of man-made fires as follows, with the noted reasons,

B-2 The low occurrence frequency in the Ruby Marshes, Franklin Lake and Snow Water Lake areas justifies the suppression of man-made fires only.
B-3: The low occurrence frequency in the Low Sagebrush & Desert Shrub areas justifies the suppression of man-made fires only.

These areas total I . 13 million acres.

3) None of the remaining polygon analyses make a strong case for fire suppression.
Comments related to the No Action Alternative

1) The statement that, "For example, a fire under low intensity conditions in an area in which there would be a positive vegetative response would most likely be immediately suppressed even if the area was designated for future prescribed burning." (page 2-32) illustrates the sort of management policies that have allowed the current unstable fuel load conditions to develop over the years. This is precisely the sort of shortsighted management policy that must change and this feature alone is sufficient to rule out the No Action alternative.

Comments related to the Full Suppression Alternative

1) The statement that, "This alternative assumes that fire does not benefit the landscape . . . (page 2-34) is an accurate representation of the alternative that renders is selection as wholly inconsistent with the bulk of the scientific wildfire research since the Yellowstone fires of 1988. This fundamental assumption is sufficient for ruling out this alternative

Comments related to the Limited Suppression Alternative

1) The conclusion that fire in an area that has a high composition of invasive plant species would not be immediately suppressed irrespective of the negative vegetative response.. " (page 2-39) is not supported by the discussion of similar effects in the Proposed Action section. Refer to the discussion of the B-1 zone for the Proposed Action (page 2-9). There is no indication that fire has a deleterious effect on areas of this type. In fact, the discussion mentions the negative effects of mechanized equipment (often associated with fire suppression activities). This inconsistency casts an inappropriate negative outlook on the Limited Suppression Alternative.

2) Rebuttal of the negative outlook noted in the previous paragraph leaves only one negative aspect stated for the Limited Suppression Alterative, that being that the "strategy provides no flexibility to achieve resource objectives" (page 2-37) This vague objection does not identify the "resource objectives" that will not be achieved. In fact several resource objectives are achieved in the zones identified as A-1, A-2 and A-3. The designation of the balance of the area as D-1 is a resource objective, which is the reinstatement of a natural fire regime in as broad an area as is consistent with private property and development concerns.

Conclusions and Recommendations

The percentages of the area addressed by this amendment in Zone D for the Proposed Action is appalling The No Action and Full Suppression alternatives are even worse. There is a vast body of work that show that fire suppression is the cause of the destabilizing high levels of fuel loadings and that a natural fire regime is far and away the most effect means of correcting these

dangerous levels. The mere presence of a public or range structures is not enough to justify full fire suppression. Trade-off assessments should be made to evaluate the relative values of increased natural fire regimes in these areas versus the value of the site. Private developments should receive the most complete protection possible consistent with fire crew safety.

For the reasons stated above I urge a reassessment of these issues and selection of the Limited Suppression Alternative for the Elko/Wells Resource Management Plans, Draft Fire Management Amendment.

Thank you for file opportunity to comment.